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*Attorneys for Plaintiff Scott Friedman*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SCOTT FRIEDMAN, an individual, )  
)  
Plaintiff, )  
)  
v. )  
)  
UNITED STATES OF AMERICA; )  
GENE M. TIERNEY, individually and )  
in his official capacity as an FBI Agent; )  
MATTHEW A. ZITO, individually and )  
in his official capacity as an FBI Agent; )  
THAYNE A. LARSON, individually and )  
in his official capacity as an FBI Agent; )  
LAS VEGAS METROPOLITAN )  
POLICE DEPARTMENT; JOE LEPORE, )  
P#6260, individually and in his official )  
capacity as an officer of the LAS VEGAS )  
METROPOLITAN POLICE )  
DEPARTMENT; DARREN HEINER, )  
P#2609, individually and in his official )  
capacity as an officer of the LAS VEGAS )  
METROPOLITAN POLICE )  
DEPARTMENT; JASON HAHN, P#3371, )

Case No. 2:18-CV-000857-JCM-VCF

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
RESPONSE TO THE OBJECTIONS  
TO THE REPORT AND  
RECOMMENDATION FILED BY THE  
FEDERAL AGENT DEFENDANTS  
(Docket No. 94) (First Request)**

1 individually and in his official capacity )  
2 as an officer of the LAS VEGAS )  
3 METROPOLITAN POLICE )  
4 DEPARTMENT; Tali Arik, an individual; )  
5 Julie Bolton, an individual; and Arik )  
6 Ventures, an entity formed by Tali Arik, )  
7 Defendants. )  
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IT IS HEREBY STIPULATED and AGREED by and between Defendants GENE TIERNEY, MATTHEW ZITO and THAYNE LARSON, by and through their counsel AUSA GREG ADDINGTON, and Plaintiff SCOTT FRIEDMAN, by and through his counsel, MELANIE A. HILL and LISA A. RASMUSSEN, that the deadline to respond to the Objections to the Magistrate's Report and Recommendation (ECF No. 94), be extended to Wednesday, October 24, 2018. This Stipulation is executed for the following reasons:

1. Tierney, Zito and Larson (collectively the federal agent defendants) filed their Objections to the Magistrate's Court's Report and Recommendation on October 5, 2018. (ECF 94.)
2. The deadline to respond to the Objections is today's date.
3. Ms. Hill was working on the Response because Ms. Rasmussen has the following other deadlines today:
  - a. A Memorandum in Support of Motion for Certificate of Appealability due in the Ninth Circuit. United States v Darell Conners, docket no. 18-16259.
  - b. A Response to a Motion to Dismiss in Maldonado v. Brian Williams, case number 14-cr-1484 APG.
  - c. A Motion for Bail Pending Appeal, United States v. Ganesh, 5:16-cr-211 LJK (USDC NDCA, San Jose).
4. Ms. Hill's best friend lost her mother this week and Ms. Hill is traveling to California today for the memorial service.

1 5. Ms. Rasmussen will be traveling to Reno on Monday, returning early Tuesday.  
2 Therefore Plaintiff's counsel has requested that they be permitted to file their  
3 response on Wednesday, October 24, 2018.

4 6. Counsel for the federal agents, Greg Addington, is not opposed to the extension.

5 7. The request for additional time in this Stipulation is made in good faith.

6 8. The requested extension is not for purposes of delay.

7 Dated this 19th day of October, 2018.

8 Respectfully submitted by,  
9

10 DAYLE ELIESON  
11 UNITED STATES ATTORNEY

LAW OFFICE OF LISA RASMUSSEN, P.C.

12 By: /s/ Greg Addington  
13 GREG ADDINGTON, AUSA  
14 Nevada Bar No. 6875  
15 Attorney for Zito, Tierney &  
16 Larson

By: /s/ Lisa A. Rasmussen  
LISA A. RASMUSSEN  
Nevada Bar No. 7491  
Attorney for Plaintiff Scott Friedman

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